

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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DEC 28 1992

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
Administration of the )  
North American Numbering Plan )

CC Docket No. 92-237

ORIGINAL  
FILE

**COMMENTS OF**  
**MCCAW CELLULAR COMMUNICATIONS, INC.**

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December 28, 1992

## TABLE OF CONTENTS

	<u>Page</u>
I. INTRODUCTION AND SUMMARY . . . . .	1
II. ALL NANP ADMINISTRATION RESPONSIBILITIES MUST BE EXPEDITIOUSLY TRANSFERRED TO NEUTRAL ENTITIES . . . . .	5
A. The Current NANP Administration and Assignment Process Is Inequitable . . . . .	5
B. No Existing Forum Is Suited To Assume Responsibility for Administration of the NANP . . . . .	8
C. Policy Functions Should Be Transferred to a New Forum Under the FCC's Auspices, and Assignment Functions Should Be Entrusted to a Neutral Entity . . . . .	10
D. There Are No Serious Obstacles to the Transfer of NANP Administration Responsibilities . . . . .	13
1. There Are No Major Cost Recovery Issues . . . . .	13
2. Bellcore and the BOCs May Assist the New NANP Administrator in Gaining Expertise . . . . .	16
III. THE COMMISSION SHOULD STATE THAT ALL MOBILE SERVICE PROVIDERS ARE ELIGIBLE TO REQUEST AND OBTAIN NON-GEOGRAPHIC NUMBERS ON A NON- DISCRIMINATORY BASIS . . . . .	17
IV. MCCA W STRONGLY SUPPORTS LOCAL NUMBER PORTABILITY . . . . .	19
V. CONCLUSION . . . . .	20
ATTACHMENT A	
ATTACHMENT B	
ATTACHMENT C	

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MCCAW CELLULAR COMMUNICATIONS, INC.

McCaw Cellular Communications, Inc. ("McCaw") respectfully submits its comments regarding the above-captioned inquiry into the administration of the North American Numbering Plan ("NANP").<sup>1</sup> For the reasons discussed below, McCaw urges the Commission to (1) transfer responsibility for the administration of the NANP and the assignment of NANP resources from Bellcore and the local exchange carriers ("LECs") to neutral entities, (2) state that all mobile service providers are eligible to obtain non-geographic NXX codes on a non-discriminatory basis, and (3) support the implementation of local number portability under ground rules that allow fair competition.

I. INTRODUCTION AND SUMMARY

More than a year ago, McCaw submitted detailed comments to the Commission in response to NARUC's request for an inquiry into administration of the NANP.<sup>2</sup> McCaw documented

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<sup>1</sup> FCC 92-470 (released October 29, 1992).

<sup>2</sup> Comments of McCaw, DA 91-1307 (filed December 20, 1991).

three sweeping shortcomings in the current process for developing NANP policy and assigning NANP resources. First, the administration process is essentially closed to input from mobile service providers. Even nominally open groups such as the ICCF and CLC are dominated by landline exchange carriers. Second, the fact that Bellcore and the BOCs are responsible for assigning vital numbering resources creates undue risks to mobile services competition. Third, Bellcore and the BOCs (and the LEC-dominated ICCF and CLC) approach the NANP administration process from a wireline perspective that often fails to accommodate the unique requirements of wireless services.

In the intervening twelve months, the situation has not improved. In fact, several developments have occurred that heighten the urgency of reforming the NANP administration process. For example:

- Last January, Bellcore released a draft Long-Term Numbering Plan,<sup>3</sup> which in several respects ignores mobile needs. Most notably, this plan persists in characterizing cellular and paging services as geographic, notwithstanding the thoroughly supported need for numbers that are not tied to physical locations. In addition, the plan does not even mention, let alone seek to promote, local number portability -- a capability that is essential if wireless services are to become full-fledged competitive alternatives to the landline local exchange. Notwithstanding substantial criticism of the plan by many industry sectors, NANPA has failed to deliver promised revised drafts or to convene open meetings to discuss the plan.

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<sup>3</sup> NANPA's Proposal on the Future of Numbering in World Zone 1 (January 1991).

- More than 18 months after the Commission asked Bellcore to do so, guidelines for the assignment of central office codes still have not been finalized. The process of developing the guidelines has been contentious and slow-moving, with many landline carriers advocating policies that would unreasonably restrict the number of codes available to cellular and paging carriers.
- Bellcore and many LECs, acting through the ICCF, have sought to exclude cellular and paging carriers from eligibility for PCS N00-NXX codes. If these entities succeed, such carriers will not be given non-geographic codes until 1995 -- if even then -- while providers of competing services will obtain such numbers in the next few months.
- At a more fundamental level, Bellcore has no mechanism (and apparently no desire) to formally notify the industry of NANPA plans regarding numbering resources. The most common means of obtaining information is to attend one of the numerous "forums" sponsored by various industry groups. Unfortunately, attendees often leave these meetings with different interpretations of the verbal messages conveyed by NANPA representatives. Even when Bellcore puts messages in writing, the text often contains conflicting statements,<sup>4</sup> and usually is directed at a single party and made generally available only upon the request of forum attendees.

Against this background, the time clearly is ripe for the instant inquiry into the future administration of the North American Numbering Plan. The record compiled in response to NARUC's petition already confirms the need for prompt transfer of NANP administration responsibilities to an

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<sup>4</sup> For example, Bellcore sent MCI a letter on November 12, 1992 regarding assignment of an interchangeable NPA (INPA) code for inbound international carrier identification. One part of the letter says Bellcore will assign an INPA for this purpose; a later passage states its "intent" to do so. See Attachment A hereto. To further the confusion, at ICCF 27 Bellcore reiterated its intent but said it had not made a final decision.

unbiased entity. Yet, there is a tentative tone to the Notice that causes McCaw concern.<sup>5</sup> In addition, the Notice does not explicitly recognize that concerns with the current administration process extend beyond Bellcore's role. The LECs' control of codes needed by their competitors and of routing and rating (through the Local Exchange Routing Guide, Terminating Point Master, and other supporting systems) must also be addressed.

Accordingly, McCaw first urges the Commission to expeditiously conclude this inquiry and, formally or informally, require the development of an open, pro-competitive process for developing numbering policy and assigning NANP resources. In this regard, McCaw supports Telocator's proposal for a new NANP Policy Council, which would be open to all interested parties and be responsible for all numbering policy issues. However, to ensure equitable and timely resolution of policy matters, the Council must be chaired by a member of the Commission's staff and accountable to the FCC under expedited review procedures.

The Council, under the auspices of the FCC, would use a competitive bidding process to select a new NANP Administrator. This entity, which would be unaffiliated with any telecommunications service provider, would handle

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<sup>5</sup> See Notice at ¶ 1 ("No immediate actions will be taken. Rather, we intend to gather information that the Commission may consider in other proceedings and activities.").

ministerial administration matters, including assignment of codes pursuant to established guidelines, compiling and disseminating the Central Office Code Utilization Survey ("COCUS") and managing the Local Exchange Routing Guide ("LERG") and other numbering support systems.

Second, the Commission should inform the ICCF and the NANPA as quickly as possible that all mobile service providers are eligible to obtain PCS N00-NXX codes on a non-discriminatory basis. The efforts of some carriers to exclude cellular and paging companies are blatantly anticompetitive.

Finally, the Commission should support the development of local number portability. Implementation of this capability will promote local exchange competition and conserve numbering resources. The necessary technology would not be difficult to develop, but existing industry bodies, which are controlled by LECs, have not even begun to discuss the issue.

II. ALL NANP ADMINISTRATION RESPONSIBILITIES MUST BE EXPEDITIOUSLY TRANSFERRED TO NEUTRAL ENTITIES.

A. The Current NANP Administration and Assignment Process Is Inequitable.

In its reply comments in DA 91-1307, McCaw reviewed the broad support for making the NANP administration process more

open and representative.<sup>6</sup> It noted that AT&T, MCI, Telocator, Metropolitan Fiber Systems, and several independent telephone companies all expressed serious concerns with Bellcore's and the BOCs' control over the allocation and assignment of NANP resources.<sup>7</sup> Even BellSouth recognized the need to establish "a specific procedural framework and time frame for discussion and timely resolution of the many numbering issues facing the industry."<sup>8</sup>

One year later, these concerns are even more pressing. As discussed above, major numbering policy issues may shortly be resolved in a fashion that seriously harms mobile service providers.<sup>9</sup> In the meantime, numbering resources have become even more scarce and cellular carriers' requests for new central office codes are not being treated any differently than before the FCC instructed Bellcore to develop uniform assignment guidelines and NARUC filed its Petition.<sup>10</sup>

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<sup>6</sup> Reply Comments of McCaw, DA 91-1307, filed January 17, 1992, at 2.

<sup>7</sup> Id. at 3-4.

<sup>8</sup> Comments of BellSouth at 2. BellSouth also urged the Commission to initiate rulemaking proceedings to develop assignment guidelines for many NANP resources. Id. at 8-9.

<sup>9</sup> These issues include the eligibility of cellular carriers for non-geographic numbers after 1995 and for PCS N00-NXX codes in the near future, and whether cellular carriers will have access to sufficient geographic NXX codes to expand their businesses and develop new service offerings. See pages 2-3, supra.

<sup>10</sup> See Comments of McCaw, DA 91-1307, at 6-9; Notice at ¶ 26.



Moreover, the increasingly scattershot manner in which numbering issues are handled impedes the ability of affected entities to participate in policy development.<sup>11</sup> Parties can raise an issue wherever they think it will be most favorably addressed, and may even introduce the same issue in multiple forums. This is both grossly inefficient and a recipe for arbitrary and capricious decision-making.

Indeed, over the last year McCaw has dedicated substantial resources to the "industry forum process" to ensure that numbers will be available to support a wide range of mobile services. While these forums may be highly regarded by those that control them,<sup>12</sup> McCaw's experience has left McCaw even more concerned that sensitive, service-affecting decisions regarding entitlement must not be made by Bellcore or by competitors and potential competitors attending unaccountable numbering forums.

McCaw has also come to realize the difficult position that NANPA is in. It is McCaw's belief that Bellcore's inability to make a decision counter to its owners'

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<sup>11</sup> Even though Bellcore currently retains ultimate authority over numbering policy, more than two dozen numbering-related issues are being considered in a plethora of forums, including the Carrier Liaison Committee ("CLC"), Industry Carrier Compatibility Forum ("ICCF"), several committees of the Exchange Carrier Standards Association ("ECSA"), TR45, the Wireless Interconnection Forum ("WIF"), several state PUCs, the FCC, and Bellcore itself.

<sup>12</sup> See Comments filed in DA 91-1307 by Pacific Telesis (at 6-7), Southwestern Bell (at 1), U S West (at 2-5), and Bellcore (at 4).

interests, coupled with the scarcity of numbering resources, effectively precludes NANPA from making decisions about numbering. Further, the appearance of impropriety adds fuel to the increasingly litigious nature of requests for numbering resources. As a result, non-BOC carriers, to the extent they are able, must force decisions -- such as the allocation of PCS codes for cellular and INPA codes for inbound international calls -- that are not generally supported by the BOCs.

In short, the current system for allocating and assigning NANP resources is inconsistent with full and fair competition, no matter how hard the incumbent administrators strive to be impartial. Thus, the answer to the fundamental question raised by the Notice is that the development of NANP policy and the assignment of numbers must be transferred from Bellcore and the LECs as quickly as possible. There are no viable alternatives.<sup>13</sup>

B. No Existing Forum Is Suited To Assume  
Responsibility for Administration of  
the NANP.

In various industry meetings over the last several months, certain parties have suggested that the ICCF should

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<sup>13</sup> Notice at ¶ 28. The other possibilities raised by the Commission, including establishment of a council to advise Bellcore and formal structural separation between the NANPA and the rest of Bellcore, *id.* at ¶ 32, do not go far enough. The current system is flawed at the core, and patchwork solutions are no substitute for building a sound new administration process.

be given responsibility for administering the NANP. McCaw strongly opposes this alternative, because the ICCF is dominated by landline LECs:

While mobile carriers may participate in [the ICCF and similar forums], they are vastly outnumbered by the BOCs and independent telcos, and McCaw believes the BOCs exercise disproportionate influence in the decision-making process. The validity of this belief appears to be borne out by the requests of AT&T, MCI, and several independent telephone companies -- all of which participate actively in industry forums and standards bodies -- for a more open and accountable NANP administration process.<sup>14</sup>

This bias is evident in the ICCF's track record on numbering issues. Having attended numerous ICCF meetings, McCaw remains puzzled and concerned over which issues are accepted and which are not. Introduction of an issue by a LEC or NANPA seems to ensure that it will be accepted by that forum with little debate. In contrast, "outsiders" have difficulty getting the ICCF even to agree to accept an issue for discussion. For example, at the most recent ICCF, one Long-Range Numbering Plan issue brought by a non-LEC was not accepted, while another LRNP issue brought by a NANPA representative was.

In addition, the ICCF moves at a glacial pace. There is no oversight mechanism to compel prompt resolution of issues, and delay often suits the business interests of the dominant

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<sup>14</sup> Reply Comments of McCaw, DA 91-1307, filed January 17, 1992, at 7. McCaw also noted that, "although many landline exchange carriers have mobile affiliates, it is McCaw's perception that their positions in industry forums are driven almost entirely by traditional landline considerations." Id. at 7 n.10.

LEC members. In fact, McCaw has found that the ICCF resists innovative ideas for the use of numbering resources. As a result, it is virtually impossible to bring to market a new, numbering-dependent service before all potential competitors have been fully informed of the nature of the service and made plans for competitive responses.

C. Policy Functions Should Be Transferred to a New Forum Under the FCC's Auspices, and Assignment Functions Should Be Entrusted to a Neutral Entity.

As the foregoing discussion indicates, the NANP administration process must be fundamentally restructured in order to become more equitable and open. McCaw agrees generally with the recommendations advanced by Telocator for doing so. This model involves a distinction between policy development functions, which include establishment of code assignment guidelines and long-term planning, and ministerial functions, such as numbering assignment pursuant to pre-existing guidelines, compilation of the COCUS, and administration of the LERG and other numbering-related data bases.<sup>15</sup>

Policy development. Consistent with Telocator's model, policy development functions should be transferred to a new

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<sup>15</sup> These support systems include RDBS (the Routing Database System, which identifies the destination code record and always routes calls to or through a LEC end office, and BRADS (the Bellcore Rating Administrative Data System, which supports the Operating Telephone Company Terminating Point Master and Numbering Plan Guide.

NANP Policy Council. This entity should take responsibility for all numbering-related issues, in order to avoid the waste and confusion engendered by the current approach. It should be open to all affected parties, including wireline and wireless carriers, long distance and local carriers, users, and regulators from all jurisdictions.<sup>16</sup> In addition, the Policy Council should be directly accountable to the FCC, in order to ensure timely and non-discriminatory decision-making.

Such accountability should have two aspects. First, the Commission would appoint a staff member to act as Chairman of the Policy Council. While the Chairman would not compel particular results, he or she should offer counsel, ensure that debate remains productive, and impose reasonable deadlines for resolution of issues. Second, any issue that the Council cannot resolve by the appointed deadline should be referred immediately to the FCC for expeditious settlement. The FCC has a wide range of tools available for doing so, including mediation, negotiated rulemaking

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<sup>16</sup> By including representatives of other World Zone 1 nations in the Policy Council, the industry and the Commission can ensure that the integrated World Zone 1 numbering plan is not adversely affected by any policy decisions made by U.S. entities. Preservation of the integrated North American plan is very important to McCaw, and it believes the Policy Council model can maintain and expand the "benefits of an internationally integrated numbering plan and integrated centralized administration," as referred to in paragraph 28 of the Notice.

techniques, and the issuance of rules or declaratory rulings based on the record compiled before the Policy Council.

Ministerial functions. The LECs must not be permitted to retain control over CO code assignments and routing and rating support systems. Responsibility for these and other ministerial functions should be entrusted to a neutral NANP Administrator. To ensure that this entity is truly independent, it should be unaffiliated with any telecommunications service provider.

As Telocator suggests, the Policy Council could be required to select an NANP Administrator, under FCC oversight, within a certain period after the Council is formed. The selection process could be based on a detailed Request for Proposal that spells out the Administrator's responsibilities, guarantees its neutrality, and requires respondents to disclose and support all charges. Such a competitive bidding process should create strong incentives for the Administrator to act efficiently and charge cost-based rates. It also would motivate prospective Administrators to propose more responsive and customer-oriented administration procedures than currently exist. Finally, and most important, it would assure all users of NANP resources that numbers henceforth will be assigned promptly and equitably.

D. There Are No Serious Obstacles to the Transfer of  
NANP Administration Responsibilities.

The Notice inquires how costs will be recovered if the responsibility for administration is shifted from Bellcore.<sup>17</sup> In addition, some LECs, as well as Bellcore, have suggested that the current administrators have developed an expertise that would be lost if a new NANP administrator were selected. Neither of these issues is significant enough to stand in the way of the reorganization outlined above.

1. There Are No Major Cost Recovery Issues.

The Notice suggests that "[t]he costs of the NANP are, in effect, paid for by Bellcore's owners and their customers." It also implies that new cost recovery issues may be raised if the administration is transferred, speculating that "[i]t is at least questionable whether we can continue to expect these costs to be incurred by private firms without compensation."<sup>18</sup> These statements appear to reflect a perception of the current administration process that differs from McCaw's experience.

First, the costs incurred by Bellcore and the way in which these costs are recovered have never been investigated. Based on its own considerable involvement in numbering issues, McCaw does not believe that the costs of Bellcore's

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<sup>17</sup> Notice at ¶ 33.

<sup>18</sup> Id.

NANPA unit, which involves a limited number of people, should be significant. In any event, neither Bellcore nor its owners are internalizing these costs. Rather, administration expenses ultimately are passed on to ratepayers, as the Notice recognizes, and to interconnecting carriers like McCaw (which is not stated in the Notice).

Second, all costs of administration are not incurred solely by Bellcore and its owners. McCaw and numerous other affected parties must pay to send representatives to numbering policy meetings sponsored by a wide range of forums, as noted above. In addition, any time an NPA is split or a new NXX code is assigned, service providers and users must update switches, PBXs, and in some cases, terminal units. As McCaw explained in its comments in DA 91-1307, cellular carriers are particularly burdened by such developments -- occasionally to an unwarranted extent because of the failure of landline LECs to involve their wireless counterparts in planning for NPA splits.<sup>19</sup>

Third, the BOCs clearly recover whatever costs they incur in administering NXX codes. McCaw believes that the charges for these codes are excessive, although it cannot confirm this because the BOCs have never been required to disclose the costs involved in assigning this resource.

Whatever the current costs of administration, the model proposed by Telocator should both reduce expenses and make

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<sup>19</sup> Comments of McCaw, DA 91-1307, at 4-6.



cost recovery more equitable. The policy-related costs currently incurred by NANPA and parties attending numbering forums will be centralized in the Policy Council. Every company wishing to participate on the Council will bear its own costs for doing so, and any common costs may be spread over the large number of companies that undoubtedly will take part. By assigning responsibility for all policy issues within a single organization, each company's costs of monitoring and contributing to policy discussions may actually decline from existing levels.

Under Telocator's model, the costs of the ministerial administration functions now performed by Bellcore and the BOCs would be incurred by the new NANP Administrator. As mentioned above, this entity would be selected on the basis of a competitive bidding process, which should ensure that administration expenses are minimized and charges for administration services are cost-based.<sup>20</sup> Marketplace forces would operate to the benefit of the industry as a whole (which will enjoy more efficient service) and the new NANP Administrator (which presumably will price its services to obtain an acceptable level of profit).

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<sup>20</sup> Of course, once administration functions are transferred to the new Administrator, the LECs would no longer assigned NXX codes or receive compensation for doing so. Thus, the Commission would not need to concern itself with whether the LECs' code assignment charges are cost-based. See Notice at ¶ 35.

2. Bellcore and the BOCs May Assist the New NANP Administrator in Gaining Expertise.

McCaw does not dispute that Bellcore and the BOCs have developed expertise in administering the NANP. This fact alone, however, does not militate against transferring administration responsibilities to new entities.

As an initial matter, the amount of expertise required to develop NANP policy and assign NANP resources is not that great. A knowledge of how telephone networks operate, a grasp of basic mathematics, and a willingness to consider and analyze the predictions and requirements of diverse industry segments is required. The new Policy Council, through its members, would possess all of these attributes. The Council would also bring regulatory expertise to the table through participation by the FCC and state and WZ1 representatives.

Moreover, whatever expertise Bellcore and the BOCs have developed with respect to code assignments, compilation of the COCUS, and administration of the LERG and related support systems could readily be transferred to the new NANP Administrator. Bellcore already has committed to assist whichever entity is selected as the new administrator of the 800 data base in getting up to speed. Undoubtedly, Bellcore and its owners would do the same for the new NANP Administrator.

III. THE COMMISSION SHOULD STATE THAT ALL MOBILE SERVICE PROVIDERS ARE ELIGIBLE TO REQUEST AND OBTAIN NON-GEOGRAPHIC NUMBERS ON A NON-DISCRIMINATORY BASIS.

The Notice asks what actions should be taken to promote personal communication services.<sup>21</sup> There is one specific action that the Commission can take in the short term: state, as soon as possible, that existing cellular and paging carriers may obtain PCS N00-NXX codes on a non-discriminatory basis.

As McCaw explained in its comments on NARUC's petition, it has for several years requested that Bellcore make non-geographic numbers available to cellular carriers in order to promote more efficient routing and seamless nationwide coverage.<sup>22</sup> Bellcore consistently resisted this request, stating that there is "no precedent" for a mobile Service Access Code and erroneously asserting that there is no mobile industry consensus that such codes are required.<sup>23</sup>

Now, Bellcore (through the ICCF) has proposed to make a non-geographic Service Access Code available for personal

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<sup>21</sup> Notice at ¶ 40.

<sup>22</sup> Comments of McCaw, DA 91-1307, at 10-12.

<sup>23</sup> Bellcore has never explained why a consensus is necessary to make code assignments to new services. Such a requirement would be blatantly anticompetitive, since it enables some competitors to hold up the assignment of codes to other competitors until they are ready to provide similar services. At any rate, there is now an indisputable consensus among all cellular carriers that non-geographic numbers should be made available to cellular services at the option of individual providers.

communications services. Unfortunately, as McCaw explained in the Introduction to these comments, many carriers are seeking to exclude cellular and paging service providers from eligibility for these new codes. Instead, the codes would be reserved for "personal mobility" services -- offerings that allow subscribers to be reached at the same number regardless of location and terminal type.

McCaw is a forerunner in the development of personal mobility services. At the same time, however, the subscribers of existing terminal mobility services, such as cellular, would benefit greatly from the availability of non-geographic codes. Indeed, McCaw is ready to use non-geographic codes today in order to enhance the efficiency and capabilities of its North American Cellular Network and implement new services.

If the ICCF continues along its current path, McCaw and other cellular providers could be denied these codes at least until the implementation of interchangeable NPAs in 1995 -- and they may not even get non-geographic numbers at that point, unless the Long-Range Numbering Plan is revised to remove the classification of cellular as a geographic service. In the interim, however, providers of personal mobility services, which compete directly against cellular, would be granted non-geographic codes. To avoid this patently anticompetitive result, McCaw urges the Commission promptly to instruct the ICCF and the NANPA that they may not

impose restrictions on the ability of mobile service providers to obtain non-geographic codes.<sup>24</sup>

#### IV. MCCAW STRONGLY SUPPORTS LOCAL NUMBER PORTABILITY.

The Notice asks for comments on the costs and feasibility of local number portability.<sup>25</sup> McCaw commends the Commission for its interest in local number portability, because this capability is an essential prerequisite to local exchange competition.

By local number portability, McCaw means the ability of a subscriber to obtain local exchange service from any service provider without changing his or her telephone number. The Commission has long recognized that the lack of number portability in the 800 context has been a significant obstacle to competition in that market.<sup>26</sup> In the local exchange market, the lack of numbering portability would be an even larger barrier, since it affects every single subscriber. Clearly, then, the potential benefits of local number portability are considerable.

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<sup>24</sup> Attachments B (McCaw's request to NANPA) and C (NANPA's response) hereto contains correspondence detailing the PCS code eligibility issue. That NANPA now seems to support McCaw's request is not of itself sufficient. NANPA cannot be the referee of which categories of requests are valid. This is the FCC's prerogative, either alone or through the Policy Council.

<sup>25</sup> Notice at ¶ 41.

<sup>26</sup> Competition in the Interstate Interexchange Marketplace, 6 FCC Rcd 5880, 5894 (1991).

From the perspective of conserving NANP resources, local number portability would yield additional benefits. Rather than each service provider needing to obtain a separate number for each destination address on its network, each address could be served by a single number regardless of the network used. Depending on the degree of competition that develops, local number portability could cut the need for numbers by a factor of two, three, or more.

The biggest problem with local number portability today is that no one is planning for it. As noted earlier, Bellcore's draft Long-Range Numbering Plan does not even mention this capability. And, of course, as long as the landline LECs retain control of the NANP administration process, it is highly unlikely that any industry body will pave the way for new competitors. McCaw accordingly urges the Commission to take steps to promote the introduction of this pro-competitive capability.

#### V. CONCLUSION

The need for fundamental reform of the NANP administration process has become even more pressing than when NARUC filed its Petition in 1991. To ensure that the future administration of the NANP promotes, rather than hinders, competition, McCaw urges the Commission to take the following three steps:

First, the Commission should direct the establishment of an open and equitable process for developing NANP policy and assigning NANP resources. The model advanced by Telocator would address existing problems with bias and responsiveness while allowing marketplace forces to promote more efficient performance of ministerial administration functions.

Second, the Commission should expeditiously state that all mobile service providers are eligible to request and obtain non-geographic codes on a non-discriminatory basis. Current efforts to exclude cellular and paging carriers from eligibility for PCS N00-NXX codes must not be permitted to succeed.

Third, the Commission should take steps to promote the introduction of local number portability, which is an essential prerequisite to full local exchange competition.

Respectfully submitted,

MCCAW CELLULAR COMMUNICATIONS, INC.

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December 28, 1992

ATTACHMENT A

**Belcore**

Bell Communications Research

137

November 12, 1992

rec'd 11/13/92

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Mr. Peter Guggina  
Director of Technical Standards  
MCI Telecommunications Corporation  
2400 N. Glenville Drive  
Richardson, Texas 75082

Dear Mr. Guggina:

The North American Numbering Plan administrator's (NANPA) organization has carefully considered MCI's request (letter to Mr. Ronald R. Conners, dated July 10, 1992) that a service access code (SAC) be assigned to "US international interexchange carriers" for the purpose of carrier-specific termination of inbound international calls. As presented by MCI, the assigned code would be shared by international carriers by allocating decades of NXX codes to individual carriers.

As previously stated, the NANPA supports the need for international network identification. The issue has always been: What numbering resource should be allocated to meet the need? The NANPA has always believed that the resolution of this issue was dependent on whether the numbering resource would be used only for dialing into WZ1 from outside WZ1 or additionally for dialing within WZ1, i.e., between countries within the NANP. For example, a shared future interchangeable NPA code (INPA) could meet the short-term need in the first instance, but not in the second instance where a shared SAC would better meet the need. The MCI request letter was clear in its intent that the need includes intra-WZ1, specifically calls from Canada to the US. Consequently, the NANPA presented MCI's request to the Canadian Steering Committee on Numbering (CSCN) in order to determine the Canadian industry's ability to perform carrier-specific routing on calls to the US based on an analysis of the digits dialed following the requested shared SAC.





**McCaw Cellular  
Communications, Inc.**

August 18, 1992

Mr. R. R. Conners  
North American Numbering Plan Administration  
Bellcore  
290 West Mt. Pleasant Avenue  
Livingston, NJ 07039-0486

Dear Mr. Conners:

On behalf of McCaw Cellular Communications, Inc. ("McCaw"), I am writing to request expedited assignment of an N00 code for use by existing mobile personal communications services, including cellular. McCaw believes that there is an urgent need for the assignment of non-geographic numbers to cellular personal communications services.

As you are aware, NANPA has stated that it will make available at least one, and possibly two, N00 codes for "personal telecommunications services" before the implementation of interchangeable NPAs in 1995. This commitment apparently was made in response to a request from AT&T for non-geographic numbers for use in connection with a "personal or mobility type of service."<sup>1</sup>

NANPA initially took the untenable position that these N00 codes would not be made available for mobility services already in existence. That position reflects NANPA's continued misunderstanding of the requirements of mobile services and its entrenched belief that cellular is purely a geographic service.<sup>2</sup> As McCaw has repeatedly explained to NANPA representatives, cellular is not a geographic-specific service. Moreover, cellular carriers have an urgent need for non-geographic codes for a variety of reasons and purposes, including: efficient routing of calls to roamers; effective implementation of nationwide wireless networks such as the North

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<sup>1</sup> Letter from Dennis K. Thovson, AT&T Corporate Standards Vice President, to R. R. Conners, dated December 17, 1991, at 1.

<sup>2</sup> McCaw informed NANPA last year of its need for non-geographic numbers, and NANPA advised it to wait for release of Bellcore's long-range numbering plan. McCaw did so, but when that plan was released, it continued to classify cellular as a geographic service ineligible for non-geographic codes.